



February 22, 2021

Linda Darling-Hammond, President and
Members of the State Board of Education
1430 N Street
Sacramento, CA 95814

Subject: Item 2: The Every Student Succeeds Act: Authorization to Pursue Flexibility on or a Waiver of Assessment, Accountability, and School Identification and Federal Funding Flexibility Requirements

Dear President Darling-Hammond and Members of the State Board of Education,

We respectfully submit this letter and feedback on behalf of the undersigned organizations and appreciate the CDE's efforts to obtain information from the United States Department of Education (ED) regarding potential flexibilities and waiver options for assessments in 2021. We write to request the SBE and the CDE pursue a waiver for the required administration of the state standardized tests for the 2020-2021 school year.

Our organizations are committed to supporting our students and staff and are eager to bring more of them back to in-person instruction and learning as soon as we can with the appropriate safety measures in place. As we navigate the myriad of considerations and decisions that go into that work, we must reiterate the importance of prioritizing instructional time and a focus on learning.

As we seek to safely reopen schools, testing will lead to lost opportunities for learning when our students need it most. It is hard to imagine the resulting pressure and continued drain on mental health if students and teachers must go from blended or virtual instructional models right into standardized testing. Moreover, students whose parents have opted for remote learning or schools where in-person learning is not possible due to rates of transmission, they will not have the option of taking state assessments in an equitable environment. As highlighted during the January SBE

meeting, home based administration of standardized testing creates substantial challenges related to equity, access and support. Parents may be unwilling to send their student to a school site just for the assessments; and if the students do come in person, it adds to the challenge of social distancing. This is especially acute and challenging for medically-fragile and other students with disabilities.

Even without a statewide assessment, our districts can and will use other tools that are available to gauge student learning and needs. A statewide assessment is not necessary for us to properly ascertain the progress our students have made this year and the supports we need to implement to accelerate their learning. Districts have been using tools throughout the year for this purpose, such as formative and benchmark assessments.

If students and staff return to school only to pivot to standardized testing within days or weeks, we will be wasting a vital opportunity for face-to-face instruction and interaction with a caring educator, limit chances for targeted learning acceleration, and exacerbate the negative mental health and social emotional challenges of learning during a pandemic. In a year where the mental health of our students is being jeopardized on a daily basis and strategic support for learning acceleration is most critical, we must seek ways to alleviate, not exacerbate, the crisis.

The data that stands to be collected from any assessment this year will be unreliable and invalid in comparison to other testing years, a reality we cannot accept when we know that data will absolutely be used to compare schools while providing no instructionally useful information that can positively impact teaching and curriculum decisions.

Student learning relies on the ability of leaders and educators to plan. In any scenario, the physical and mental health of students, staff and families outweigh any nominal benefit unreliable tests may offer. We both strongly support and need flexibility to allow local education agencies discretion in selecting and administering the tests they need to reliably, efficiently, and quickly evaluate student learning progress, needs and gaps. For these reasons, we urge the SBE and the CDE to pursue a waiver for the required administration of the state standardized tests for the 2020-2021 school year.

We appreciate your consideration of our comments and look forward to continued partnership.

Sincerely,

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